

Summary and Response to Comments: Proposed Regulation on Product Stewardship for Carpets
Sorted by Comment Number

Comment Number	Commenter Affiliation	First name	Last name	Summary of Comment	CalRecycle Response	Revisions Needed	Section/Area
W01-01	Los Angeles Co Solid Waste Mgmt Committee (LACSWMC)/ Integrated Waste Mgmt Task Force (IWMTF)	Mike	Mohajer	Definition of “Diversion” in Subdivision 18941(f) needs to be revised to read “Diversion means activities which reduce or eliminate the amount of postconsumer carpet from landfill disposal.” AB 2389 does not require nor does it state any intent to mandate diversion of postconsumer carpet from transformation facilities. The current definition of diversion within the proposed Regulations contradicts AB 2398’s stated purpose as the bill legislatively mandates diversion only from landfills.	AB 2398 and current statute provide a clear distinction between recycling and diversion and identify transformation as a type of diversion, but not as a type of recycling (see PRC section 40180). Staff notes that confusion reflected in this comment may have arisen by having different definitions in the Article concerning carpet stewardship as compared to other sections in Public Resources Code and agrees to modify definition of diversion and include the definition of transformation so they are identical to where they appear elsewhere in the Public Resources Code. CalRecycle staff emphasizes that it is not changing existing statute. Although not required, providing the definitions of diversion and transformation in these regulations will make them readily available for users. CalRecycle will also provide discussion on this important issue in the Final Statement of Reasons (FSOR).	Yes	Sections 18941 (f) and 18941 (l)
W01-02	LACSWMC/ IWMTF	Mike	Mohajer	The current definition also contradicts the provisions of AB 939, which provides up to 10 percent diversion credit for solid waste managed through existing transformation facilities.	CalRecycle staff added language to provide clarity that this Article does not modify or abrogate in any manner existing provisions of Section 41783 of the Public Resources Code related to transformation that allow jurisdictions to reduce their per-capita disposal rate by no more than 10 percent. Materials sent to transformation facilities must meet the requirement of Section 41783(a)(2) of the Public Resources Code regarding front-end methods or programs to remove all recyclable materials from the waste stream prior to transformation to the maximum extent feasible.	Yes	Section 18943 (a)(4)(C)
W01-03	LACSWMC/ IWMTF	Mike	Mohajer	Subdivision 18943(a)(4)(A) of the proposed Regulations should be amended to read: “Proposed measures that will enable the management of post-consumer carpet in a manner consistent with the State’s <u>current</u> solid waste management hierarchy pursuant to PRC Section 40051 and demonstrate that over time source reduction, reuse, and recycling will increase, over environmentally safe transformation and land disposal.” Note that PRC Section 40051 already establishes the requirement to “Maximize the use of all feasible source reduction, recycling, and composting options in order to reduce the amount of solid waste that must be disposed of by transformation and land disposal.”	The suggested edit is identical to existing proposed regulatory language with the exception of the word “current”, which is implicit in the draft language.	No	Section 18943 (a)(4)(A)

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W01-04	LACSWMC/IWMTF	Mike	Mohajer	Regulations should be revised to make it clear that postconsumer carpet material managed through a CT facility would be considered diversion for the purposes of complying with AB 2398.	California law does not define “conversion technology” and it is outside the scope of this regulation to do so. CalRecycle determines on a case by case basis if a facility is classified as a disposal or non-disposal facility. For additional information refer to guidance on conversion technologies at this webpage: www.calrecycle.ca.gov/Organics/Conversion/ . To be consistent with AB2398, source reduction, reuse, and recycling take precedent over conversion technologies.	No	Section 18941
W01-05	LACSWMC/IWMTF	Mike	Mohajer	Subdivision 18943(a)(4)(B) creates an additional accounting system that requires “[m]anagement of carpet through source reduction, reuse and recycling must be greater than, and grow at a higher rate than the management of carpet through carpet as alternative fuel, Waste-to-Energy, and incineration.” There is no basis in AB 2398 to require this additional unwieldy and impractical accounting system, which seems to diminish or stifle the role of various options to divert postconsumer carpet from landfill disposal. As a result, we request the subdivision be deleted.	CalRecycle staff wants to clarify that the accounting activity in this section is not an activity that local jurisdictions would be required to conduct. Instead, the carpet stewardship organization, Carpet America Recovery Effort (CARE), already conducts an annual survey to collect this type of information.	No	Section 18943 (a)(4)(B)
W01-06	LACSWMC/IWMTF	Mike	Mohajer	CalRecycle should amend the proposed Regulations to identify all viable and feasible end-of-life management options including, but not limited to, CTs that divert carpet waste from landfill disposal as “diversion.”	See response to W01-04.	No	Section 18941
W02-01	LACSD	Glenn	Acosta	Message has statement, "The bill specifically says diversion from landfills, not transformation."	See response to W01-01.	Yes	Sections 18941 (f) and 18941 (l)
W03-01	Carpet America Recovery Effort (CARE)	Georgina	Siskorski	In the course of carrying out our duties as the carpet stewardship organization, it has been brought to our attention that the definition of ‘carpet’ has been subject to interpretation. Please see the letter from Speaker Perez (June 3, 2011) on this matter.Proposed Revision to the definition of carpet Chapter 20, Section 42971: (d) (1) “Carpet” means a manufactured article that is used in commercial or residential flooring applications as a decorative or functional feature and that is primarily constructed of a top visible surface of synthetic or natural face fibers or yarns or tufts attached to a backing system derived from synthetic or natural materials. (2) “Carpet” includes, but is not limited to, a commercial or a residential broadloom carpet or modular carpet tiles. (3) “Carpet” does not include a rug, pad, cushion, or underlayment used in conjunction with, or separately from, a carpet.	CalRecycle staff recognizes there has been confusion over the definition of carpet and that a purpose of regulations is to provide clarity; however, CalRecycle does not have the authority to change definitions in statute. Also see response to W05-01.	No	Section 18941(d)

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W03-02	CARE	Georgina	Siskorski	Further, the definition of ‘rug’ in the Proposed Product Stewardship for Carpet Regulations (March 16, 2011), has also raised questions of clarity and interpretation.Proposed Revision to the definition of “Rug”, Proposed Product Stewardship for Carpet Regulations Section 18941 “Rug” means a loose laid (not installed or attached at wall base) soft floor covering manufactured from natural or synthetic fiber, including carpet cut into room or area dimensions that is not intended to cover the entire floor.	The definition requested is already in the proposed regulation.	No	
W04-01	SWANA	William	Merry	AB 2398 specifically calls for diverting postconsumer carpet from landfills. Nowhere in the bill does it mandate or mention diverting carpet from transformation facilities. The bill does not even mention the word “transformation,” so there is no basis for CalRecycle to imply that the bill gives staff the authority to limit transformation in favor of reduction, reuse, and recycling. This, however, is what CalRecycle is mandating in the proposed carpet stewardship regulations. CalRecycle is departing from the legislative intent of the bill and its provisions, and, as a consequence, what the bill authorized.	See response to W01-01	Yes	Sections 18941 (f) and 18941 (l)
W05-01	Scott Group Custom Carpets, Inc.	Paul	Hudson	AB 2398 specifically emphasizes that the program is for carpets made of synthetic materials. As the legislators were likely aware, this emphasis on synthetic fibers is very important since most recycling facilities in CA do not accept carpets made from wool and similar natural fibers. If carpets made from natural fibers were included in the requirements of AB 2398, California consumers would be required to participate in a program that they were not allowed to use. We are obliged to emphasize these facts since a comment was previously posted by CARE (Comment No. W03) suggesting that the definition of carpet for the Carpet Stewardship program be revised to include carpets made of natural fibers. Though not specifically called out in Comment W03, a significant change was proposed adding the word natural to the definition: From: “...constructed of a top visible surface of synthetic face fibers....” To: “... constructed of a top visible surface of synthetic or natural face fibers....” We believe this revised wording is inappropriate given the inability of consumers to utilize recycling facilities for carpets made of wool or other natural materials.	<p>The intent of the author of AB 2398 was to include wool and other natural fiber carpets in the definition of carpet. Additionally, if the intent of the author had been to exclude wool, it would have been included in the list of exclusions (refer to the Speaker’s letter of June 3, 2011). Furthermore, some major recyclers in California do accept wool for recycling and others report to CalRecycle that they are currently expanding in this area.</p> <p>The purpose of regulation is to provide clarity; however, CalRecycle does not have the authority to change definitions in statute. See response to W03-01.</p>	No	Section 18941 (d)

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W06-01	Stanislaus County	Mandip	Dhillon	We are concerned that with respect to transformation, the proposed carpet stewardship regulations go beyond the intent and the provisions in AB 2398. AB 2398 specifically calls for diverting postconsumer carpet from <u>landfills</u> . Nowhere in bill does it mandate or mention diverting carpet from transformation facilities. In fact, the bill does not contain the word “transformation,” therefore; including it in the proposed regulations would give CalRecycle the authority to limit transformation in favor of reduction, reuse, and recycling. This is departure from the legislative intent of the bill and as is a deviation from what the bill authorized.	See response to W01-01	Yes	Sections 18941 (f) and 18941 (l)
W06-02	Stanislaus County	Mandip	Dhillon	The purpose of the bill is to "increase the amount of postconsumer carpet that is <u>diverted from landfills</u> ... the definition of "diversion" in the regulations needs to be changed to: "Diversion” means any combination of waste prevention (source reduction), recycling, reuse, and composting activities that reduces waste disposed at permitted landfills and transformation facilities <u>or otherwise managed in a manner that is consistent with the state's hierarchy for waste management practices pursuant to Section 40051.</u>	See response to W01-01.	Yes	Sections 18941 (f) and 18941 (l)
W06-03	Stanislaus County	Mandip	Dhillon	The proposed regulations appear to direct how solid waste should be managed in California...and there is no mention of transformation in the bill. Modify 18943(a)(4) as follows: (A) Proposed measures that will enable the management of post-consumer carpet in a manner consistent with the state’s solid waste management hierarchy pursuant to PRC Section 40051 and demonstrate that over time source reduction, reuse, and recycling will increase, over environmentally safe transformation and land disposal. (B) Management of carpet through source reduction, reuse and recycling must be greater than, and grow at a higher rate than the management of carpet through carpet as alternative fuel, Waste to Energy, and incineration.	CalRecycle staff does not intend to "direct" solid waste management, but rather to provide clarity so the intent of the AB2398 can be carried out. The law clearly seeks to advance material management practices according to the solid waste management hierarchy. Section 18943(a)(4) as written does not "direct" materials management, rather it provides some basic ground rules so stewardship plans are designed to support the solid waste management hierarchy. Otherwise the increases in carpet collection could result in combustion over activities such as source reduction, reuse and recycling. CalRecycle staff chooses not to include new terms that would require definition and instead replaces "Waste-to-Energy and incineration" with "and other forms of combustion".	Yes	Sections 18943(a)(4)(A) and 18943(a)(4)(B)
W07-01	Los Angeles County	Margaret	Clark	Definition of “Diversion” in Subdivision 18941(f) needs to be revised to read “Diversion means activities which reduce or eliminate the amount of postconsumer carpet from landfill disposal.” AB 2389 does not require nor does it state any intent to mandate diversion of postconsumer carpet from transformation facilities. The current definition of diversion within the proposed Regulations contradicts AB 2398’s stated purpose as the bill legislatively mandates diversion only from landfills.	See W01-01	Yes	Sections 18943(a)(4)(A) and 18943(a)(4)(B)
W07-02	Los Angeles County	Margaret	Clark	The current definition also contradicts the provisions of AB 939, which provides up to 10 percent diversion credit for solid waste managed through existing transformation facilities.	See W01-02	Yes	Section 18943 (a)(4)(C)

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W07-03	Los Angeles County	Margaret	Clark	To also be consistent with requirements of AB 2398 and in concert with the provisions of Section 42972 of the Public Resources Code (PRC), Subdivision 18943(a)(4)(A) of the proposed Regulations should be amended to read:“Proposed measures that will enable the management of post-consumer carpet in a manner consistent with the State’s current solid waste management hierarchy pursuant to PRC Section 40051 and demonstrate that over time source reduction, reuse, and recycling will increase, over environmentally safe transformation and land disposal.” Note that PRC Section 40051 already establishes the requirement to “Maximize the use of all feasible source reduction, recycling, and composting options in order to reduce the amount of solid waste that must be disposed of by transformation and land disposal.”	See W01-03	No	Section 18943 (a)(4)(A)
W07-04	Los Angeles County	Margaret	Clark	Subdivision 18943(a)(4)(B) creates an additional accounting system that requires “[m]anagement of carpet through source reduction, reuse and recycling must be greater than, and grow at a higher rate than the management of carpet through carpet as alternative fuel, Waste-to-Energy, and incineration.” There is no basis in AB 2398 to require this additional unwieldy and impractical accounting system, which seems to diminish or stifle the role of various options to divert postconsumer carpet from landfill disposal. As a result, we request the subdivision be deleted.	See W01-05	No	Section 18943 (a)(4)(B)
W07-05	Los Angeles County	Margaret	Clark	Conversion technologies (CT) are not defined or otherwise addressed anywhere in the Regulations. As discussed above, the legislative mandate of AB 2398 is to divert postconsumer carpet from landfill disposal. Therefore, the proposed Regulations should be revised to make it clear that postconsumer carpet material managed through a CT facility would be considered diversion for the purposes of complying with AB 2398.	See W01-04	No	Section 18941
W07-06	Los Angeles County	Margaret	Clark	It is worth noting that AB 2398 specifically requires carpet stewardship plans to “Include goals that, to the extent feasible based on available technology and information, increase the recycling of postconsumer carpet, increase the diversion of postconsumer carpets that cannot feasibly be recycled from land disposal, increase the recyclability of carpets, and incentivize the market growth of secondary products made from postconsumer carpet” (emphasis added). As such, CalRecycle should amend the proposed Regulations to identify all viable and feasible end-of-life management options including, but not limited to, CTs that divert carpet waste from landfill disposal as “diversion.”	See W01-04	No	Section 18941

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W08-01	County Sanitation Districts of Los Angeles	Stephen	Maguin	AB 2398 does not authorize CalRecycle to limit or impact transformation. We request that CalRecycle revert back to the exact provisions contained in AB2398 and delete references to transformation from the proposed regulations.	See response to W01-01	Yes	Sections 18941 (f) and 18941 (l)
W08-02	County Sanitation Districts of Los Angeles	Stephen	Maguin	The proposed regulations should not abrogate the provisions of AB939, which provides up to 10 percent diversion credit for solid waste managed through existing transformation facilities provided that there is front-end recovery of recyclable materials. This diversion credit recognizes that transformation is a post-recycling alternative to landfilling where energy is produced. A significant percentage of carpet waste is not recyclable so without transformation, carpet waste would be landfilled.	See response to W01-02.	Yes	Sections 18941 (f) and 18941 (l)
W08-03	County Sanitation Districts of Los Angeles	Stephen	Maguin	Initial Statement of Reasons fails to cite statutory authority to limit transformation	CalRecycle staff proposes changes that will remove this issue. See response to W01-02.	Yes	Sections 18941 (f) and 18941 (l)
W08-04	County Sanitation Districts of Los Angeles	Stephen	Maguin	The definition of "diversion" need to be changed and the reference to "transformation facilities" should be removed from Section 18941(f).	See response to W01-01	Yes	Sections 18941 (f) and 18941 (l)
W08-05	County Sanitation Districts of Los Angeles	Stephen	Maguin	Avoid preference in the solid waste management hierarchy. CalRecycle appears to be directing how solid waste should be managed in California rather than following the provisions in AB2398 and simply referring to the solid waste management hierarchy. Therefore, Section 18943(a)(4) should be as follows: "Proposed measures that will enable the management of post-consumer carpet in a manner consistent with the state's solid waste management hierarchy pursuant to PRC Section 40051 and demonstrate that over time source reduction, reuse and recycling will increase." (Delete rest of section)	See response to W06-03	Yes	Sections 18943 (a)(4)(A) and 18943 (a)(4)(B)
W09-01	County Sanitation Districts of Los Angeles	Stephen	Maguin	In summary, the proposed definition of "diversion" fails to recognize the statutory distinction between landfills and transformation by treating landfill and transformation in an identical fashion. Further, the proposed definition is inconsistent with statute that recognize, within specified limits, transformation for the purposes of diversion credit. Therefore, there are clear conflicts between the statute definition and the proposed definition of "diversion" in the <i>Draft Regulatory Text</i> .	See response to W01-01.	Yes	Sections 18941 (f) and 18941 (l)

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W10-01	CARE	Georgina	Sikorski	Page 1/ Line 20: Recommended Change : “Administrative fee” means payments from the manufacturer or stewardship organization <u>carpet assessment</u> to the department that cover the costs of its administrative, oversight, and enforcement services necessary for manufacturers or stewardship organizations to effectively implement carpet stewardship plans. <u>The administrative fee will be processed through the manufacturer or stewardship organization.</u>	CalRecycle staff agrees with recommended change to the definition of "Administrative fee" with some slight changes to what was suggested.	Yes	Section 18941 (b)
W10-02	CARE	Georgina	Sikorski	Page 6/ Line 27: Recommended change is to capitalize "Carpet As Alternative Fuel"	CalRecycle staff agrees with the recommended change.	Yes	Section 18943 (a)(4)(B)
W10-03	CARE	Georgina	Sikorski	Page 4/ Line 3: Recommended Change Remove the statement on Page 4/Line 3 referring to a signature of a corporate office signed under the penalty of perjury. AB2398 provides for civil, not criminal penalties.	CalRecycle only has authority covering civil penalties, however, the plans and activity reports required to be filed under the CalRecycle Carpet Stewardship Regulation are instruments which are recorded within the meaning of Penal Code section 115. In other words, this language is not included for enforcement by CalRecycle, but could be used by others. In adopting the regulatory requirement for a penalty of perjury signature, CalRecycle is not violating the nondelegation rule because the crime and its punishment are already established in the Penal Code. The false swearing is made a crime by Congress not CalRecycle. The penalty is established by statute, not CalRecycle. The regulation adopted is consistent with established statute.	No	Section 18942(b)
W10-04	CARE	Georgina	Sikorski	Page 6/ Line 1: Recommended Change (A) Numeric Performance goals and a description of how program goals will be achieved for the following categories:	CalRecycle staff acknowledges that not all of the goals are numeric, however, numeric goals are essential for implementation of AB2398, in particular for reuse and recycling. CalRecycle staff proposes changes that will make the goals numeric only for those two categories.	Yes	Section 18943 (a)(3)(A)

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W10-05	CARE	Georgina	Sikorski	Page 6 /Lines 19-27: Recommended Change: (3) Proposed measures that will enable the management of postconsumer carpet in a manner consistent with the state’s solid waste management hierarchy pursuant to PRC-Section 40051 and demonstrate that over time, <u>including, but not limited to, source reduction, reuse and recycling will increase, over environmentally safe transformation and land disposal source separation and processing to segregate and recover recyclable materials, and environmentally safe management of materials that cannot feasibly be recycled.</u>	CalRecycle staff believes that the submitter of the comment meant to refer to subsection (4) and not subsection (3). See response W06-03	Yes	Section 18943(a)(4)(A)
W10-06	CARE	Georgina	Sikorski	Page 7/ Line 1: Recommended Change: (B) Types of destinations for reuse and recycling activities, processing and/or disposal by product type.	CalRecycle staff agrees with recommended change.	Yes	Section 18943(a)(5)(B)
W10-07	CARE	Georgina	Sikorski	Page 7/ Line 14: Recommended Change: Description of how each consumer that pays a carpet stewardship assessment, including but not limited to those in rural areas, will have an opportunity to conveniently and properly manage their post-consumer carpet.	CalRecycle staff partially agrees with the comment. CalRecycle staff agrees to strike "properly" given that existing laws already address proper disposal. CalRecycle staff can appreciate the concern of unclear terms such as "conveniently." At the same time, there is real concern from many other stakeholders about the need to provide recycling services to consumers who contribute to the stewardship program, yet are located in more remote locations. CalRecycle chooses not to include a prescriptive definition of "conveniently"; instead it proposes using "reasonably convenient" as a means of acknowledging that plans must provide for carpet recycling services across the state, while considering regional differences.	Yes	Section 18943(a)(5)(E)
W10-08	CARE	Georgina	Sikorski	Page 10/ Line 30: Recommended Change: 2. Data are specific to post-consumer carpet diverted from California landfills.	CalRecycle staff agrees with recommended change with the addition of "sales" information from California.	Yes	Section 18944(a)(5)(B)(2)
W10-09	CARE	Georgina	Sikorski	Page 18/ Line7: Change "immediate" to "reasonable and timely" Current Statement in Proposed Carpet Regulations (March 16, 2011): (b) Provide the department with immediate access to its facilities, operations,... Recommended Change: Provide the department with reasonable and timely access to its facilities, operations...	CalRecycle staff agrees with recommended change with additions. It is important to specify who determines what is reasonable and timely. Through experience CalRecycle knows it should make this determination and that a time period should vary depending on the situation. For this reason CalRecycle will not specify an exact time period in the regulation.	Yes	Section 18946 (b)

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W11-01	California Product Stewardship Council	Heidi	Sanborn	Section 18943 (a)(5)(E): CPSC supports the Regional Council of Rural Counties (RCRC) in ensuring that all consumers that pay a fee have access to recycle their carpet. The current language does meet that test and we will defer to RCRC if there are any proposed changes to the existing language as to what meets their needs.	No change is requested.	No	Section 18943 (a)(5)(E)
W12-01	Regional Council of Rural Counties (RCRC)/ ESJPA	Mary	Pitto	The ESJPA supports the proposed regulations and believes that language in Section 18943 (a)(5)(E) is a particularly important aspect of the criteria for approval to our organization: "Description of how each consumer that pays a carpet stewardship assessment, including but not limited to those in rural areas, will have an opportunity to conveniently and properly manage their post-consumer carpet."	CalRecycle staff made a modification to include the term "reasonably convenient" in response to a comment by CARE. See response to W10-07	Yes, in response to W10-07	Section 18943 (a)(5)(E)
W13-01	San Joaquin County	Kimbra	Andrews	There should be a possibility of adjusting the assessment fees to incentivize recycled-content carpet.	The stewardship organization may adjust assessment fees (with approval from CalRecycle) or modify its financing mechanism to better achieve program goals and this could include incentivizing recycled-content carpet. Section 18944(a)(6) specifies that annual reports describe market development activities to incentivize the market growth of products made from post-consumer carpets. This is intended to encourage market development activity, without directing it, as that is beyond the scope of CalRecycle's authority.	No	Section 18944(a)(6)
W14-01	Californian's Against Waste	Teresa	Bui	<p>We are strongly opposed to the inclusion of language equating carpet ‘waste-to-energy’ (CAAF) to diversion and continue to oppose any funding for CAAF. According to Section 42970: “The purpose of this chapter is to increase the amount of postconsumer carpet that is diverted from landfill <u>and</u> recycled into secondary products...” Subsidizing the use of carpet as fuel is not consistent with this intent. This program should not incentivize the burning of carpet, which does not have the resource conservation benefits of recycling. There is already a financial benefit for recyclers and manufacturers to use CAAF because they do not have to pay landfill tipping fees and have a cheap source of boiler fuel, and California should not be further subsidizing this practice as part of the carpet stewardship program. There is nothing that would preclude someone from using CAAF, but there should not be any financial reimbursement for doing so.</p> <p>We urge the Department to implement AB 2398 as intended and strike all provisions of the regulation that provide incentive payments to CAAF.</p>	Section 18943 (4)(B) is intended to ensure that a stewardship plan must support activities at the top of the solid waste management hierarchy, without directing activities but still allowing flexibility. CalRecycle staff, as required by section 42970 and 40051, will not approve a plan that allows disproportionate incentives for CAAF or transformation over higher level solid waste management hierarchy options. This will be part of CalRecycle's internal process for plan reviews and is outside of the rulemaking process. Also, by defining CAAF as a type of diversion and not a type of recycling, it is clearly at a lower level in the hierarchy.	Yes	Section 18943 (4)(B)

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W15-01	Carpet Collectors	Ron	Smith	Carpet Collectors want to use what is left after the carpet face fiber is sheared off as daily cover in landfill. Would this type of material qualify for reimbursement in a stewardship plan? The material consists of calcium carbonate, a small percentage of embedded fiber and polypropylene used in carpet backing.	CalRecycle staff cannot answer the specific questions because it would depend on the stewardship plan. Another related question is would the carpet residue (backing and some fiber) qualify as recycling? The carpet residue would qualify as recycling, if it became an approved Alternative Daily Cover (ADC) material. The residue does not appear to qualify under any of the ADC materials already specified in Title 27, California Code of Regulations 20690(b). However, the applicant can, in collaboration with the landfill and with the approval of the Local Enforcement Agency, set up a site-specific demonstration to test the suitability of the material. This would be done in a separate process and would not change the proposed regulations.	No	Not applicable

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